

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>DAVID COMAROW, individually and on behalf of all others similarly situated,</p> <p>Plaintiffs,</p> <p>v.</p> <p>TRTCLE, CORP.,</p> <p>Defendant.</p>	<p>Case No. 1:24-cv-7096</p> <p><u>ANSWER TO CLASS ACTION COMPLAINT</u></p>
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Defendant TRTCLE, CORP., as and for its Answer to Plaintiff's Class Action Complaint (the "Complaint"), responds as follows:

Nature of the Case

1. Defendant denies the allegations in Paragraph 1 of the Complaint.
2. Defendant denies the allegations in Paragraph 2 of the Complaint.
3. Defendant denies the allegations in Paragraph 3 of the Complaint.
4. Defendant denies the allegations in Paragraph 4 of the Complaint.
5. Paragraph 5 of the Complaint contains conclusions of law to which no response is required. If a response is required, Defendant denies the allegations in Paragraph 5 of the Complaint.
6. Defendant denies the allegations in Paragraph 6 of the Complaint.

Parties

I. Plaintiff Comarow

7. Defendant lacks the knowledge and information sufficient to form a belief as to the truth of the allegation in Paragraph 7 of the Complaint.

8. Defendant lacks the knowledge and information sufficient to form a belief as to the truth of the allegation in Paragraph 8 of the Complaint.

9. Defendant admits the allegations in Paragraph 9 of the Complaint.

10. Defendant denies the allegations in Paragraph 10 of the Complaint.

11. Defendant lacks the knowledge and information sufficient to form a belief as to the truth of the allegation in Paragraph 11 of the Complaint.

12. Defendant denies the allegations in Paragraph 12 of the Complaint.

13. Defendant denies the allegations in Paragraph 12 of the Complaint.

II. Defendant TRTCLE, CORP.

14. Defendant admits the allegation in Paragraph 14 of the Complaint.

15. Defendant denies the allegations in Paragraph 15 of the Complaint except admits that it sells pre-recorded continuing legal education videos to customers in the United States.

Jurisdiction and Venue

16. Defendant admits the allegation in Paragraph 16 of the Complaint.

17. Defendant admits the allegation in Paragraph 17 of the Complaint.

Video Privacy Protection Act

18.Paragraph 18 of the Complaint contains conclusions of law to which no response in required. If a response is required, Defendant denies the allegations in Paragraph 18 of the Complaint.

19.Defendant denies the allegations in Paragraph 19 of the Complaint.

20.Defendant denies the allegations in Paragraph 20 of the Complaint, excepts lacks knowledge and information sufficient to form a belief as to the truth of the quotations included in Paragraph 20.

21.Defendant denies the allegations in Paragraph 21 of the Complaint, excepts lacks knowledge and information sufficient to form a belief as to the truth of the quotations included in Paragraph 21.

22.Defendant denies the allegations in Paragraph 22 of the Complaint, excepts lacks knowledge and information sufficient to form a belief as to the truth of the quotations included in Paragraph 22.

23.Defendant denies the allegations in Paragraph 23 of the Complaint, excepts lacks knowledge and information sufficient to form a belief as to the truth of the quotations included in Paragraph 23.

24.Defendant denies the allegations in Paragraph 24 of the Complaint.

Background Facts

I. Consumers' Personal Information Has Real Market Value

25. Defendant denies the allegations in Paragraph 25 of the Complaint, excepts lacks knowledge and information sufficient to form a belief as to the truth of the quotations included in Paragraph 25.

26. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 26 of the Complaint.

27. Defendant denies the allegations in Paragraph 27 of the Complaint, excepts lacks knowledge and information sufficient to form a belief as to the truth of the quotations included in Paragraph 27.

28. Defendant denies the allegations in Paragraph 28 of the Complaint.

29. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 29 of the Complaint.

30. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 30 of the Complaint.

31. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 31 of the Complaint.

32. Defendant denies the allegations in Paragraph 32 of the Complaint.

33. Defendant denies the allegations in Paragraph 33 of the Complaint.

34. Defendant denies the allegations in Paragraph 34 of the Complaint.

35. Defendant denies the allegations in Paragraph 35 of the Complaint.

II. Consumers Place Monetary Value on their Privacy and Consider Privacy Practices When Making Purchases.

36. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 36 of the Complaint.

37. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 37 of the Complaint.

38. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 38 of the Complaint.

39. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 39 of the Complaint.

40. Defendant denies the allegations in Paragraph 40 of the Complaint.

41. Defendant denies the allegations in Paragraph 41 of the Complaint.

III. Defendant Uses the Meta Pixel to Systematically Disclose its Customers' Subscription Purchases and Personal Viewing Information to Meta. [Denied]

42. Defendant denies the allegations in Paragraph 42 of the Complaint.

A. The Meta Pixel

43. Defendant admits the allegations in Paragraph 43 of the Complaint.

44. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 39 of the Complaint.

45. Defendant denies the allegations in Paragraph 45 of the Complaint.

46. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 46 of the Complaint.

47. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 47 of the Complaint.

48. Defendant denies the allegations in Paragraph 48 of the Complaint.

B. Defendant Knowingly Uses the Meta Pixel to Transmit the Subscription Purchases and Private Viewing Information of its Customers to Meta [Denied].

49. Defendant denies the allegations in Paragraph 49 of the Complaint except admits that it sells continuing legal education videos to its customers and further admits that its customers provide their names, e-mail addresses, billing addresses and forms of payment only to Defendant.

50. Defendant denies the allegations in Paragraph 50 of the Complaint.

51. Defendant denies the allegations in Paragraph 51 of the Complaint.

52. Defendant denies the allegations in Paragraph 52 of the Complaint.

53. Defendant denies the allegations in Paragraph 53 of the Complaint.

54. Defendant denies the allegations in Paragraph 54 of the Complaint.

55. Defendant denies the allegations in Paragraph 55 of the Complaint.

56. Defendant denies the allegations in Paragraph 56 of the Complaint.

57. Defendant denies the allegations in Paragraph 57 of the Complaint.

Class Action Allegations

58. Defendant admits the allegations in Paragraph 58 of the Complaint.

59. Defendant lacks knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 59 of the Complaint.

60. Defendant denies the allegations in Paragraph 60 of the Complaint.

61. Defendant denies the allegations in Paragraph 61 of the Complaint.

62. Defendant denies the allegations in Paragraph 62 of the Complaint.

63. Defendant denies the allegations in Paragraph 63 of the Complaint.

Cause of Action

64. Defendant repeats the responses to the preceding paragraphs as if set forth in full here.

65. Defendant denies the allegation in Paragraph 65 of the Complaint.

66. Paragraph 66 of the Complaint contains conclusions of law to which no response is required. If a response is required, Defendant denies the allegations in Paragraph 66 of the Complaint.

67. Paragraph 67 of the Complaint contains conclusions of law to which no response is required. If a response is required, Defendant denies the allegations in Paragraph 67 of the Complaint.

68. Paragraph 68 of the Complaint contains conclusions of law to which no response is required. If a response is required, Defendant denies the allegations in Paragraph 68 of the Complaint.

69. Paragraph 69 of the Complaint contains conclusions of law to which no response is required. If a response is required, Defendant denies the allegations in Paragraph 69 of the Complaint.

70. Defendant denies the allegations in Paragraph 70 of the Complaint.

71. Defendant denies the allegations in Paragraph 71 of the Complaint.

72. Defendant denies the allegations in Paragraph 72 of the Complaint.

73. Defendant denies the allegations in Paragraph 73 of the Complaint.

74. Defendant denies the allegations in Paragraph 74 of the Complaint.

WHEREFORE, Defendant requests judgment dismissing the Complaint in its entirety and with prejudice, and for such other and further relief the Court deems just and fair.

Dated: December 24, 2024

Respectfully Submitted,

Rooney Law
Attorneys for Defendant

/s/ Jeremy Klausner (JK2582)
300 Park Avenue
New York City, New York 10022
(212) 545-8022
jeremy.klausner@rooney.law